

UNITED STATES BANKRUPTCY COURT

District of Massachusetts

\*\*\*\*\*

In Re Brian C. Sheehy	*	Chapter 7
	*	Case No. 11-11233 (FJB)
	*	
	*	Adversary Proceeding
	*	Case Number 11-01167

\*\*\*\*\*

JOINT MOTION TO EXTEND DEADLINE FOR COMPLIANCE WITH  
PRETRIAL ORDER

1. Moving party/creditor OPEIU Local 600 and Debtor Sheehy hereby respectfully and jointly move that the deadlines for compliance with the Court's June 13, 2011 Pretrial Order be extended as further set forth below.
2. Both parties represent that they have begun the process required under Fed.R.Civ.P 26 to review voluntary discovery and are making good faith efforts to review and supply documents requested and schedule necessary depositions.
3. Moving Party contacted counsel for the Assistant U.S. Trustee, Eric K. Bradford, but was unable to reach him prior to filing this Motion.
4. Both parties represent that an extension of time is necessary to allow both parties to gather the

documents and information sought that are relevant and material to the claims and defenses in this matter.

5. The parties propose the following revisions to the Court's Pre Trial Order:

- a. Extend the date for a continued Rule 26(f) conference between the parties until September 15, 2011;
- b. Extend the date for a written report to the Court regarding compliance with Rule 26(a)(1) and (2) until October 14, 2011.
- c. Extend the date for completion of discovery until November 30, 2011.
- d. Extend the date for completion of a Joint Pretrial Memorandum until January 6, 2012.

Respectfully Submitted,

OPEIU Local 600

By Its Attorney,

/s/Howard B. Lenow  
Howard B. Lenow  
Lenow & McCarthy  
13 Pelham Island Road  
Wayland, MA 01778  
BBO# 293660  
508.358.8181  
508.358.8989 (fax)  
lenow@masslaborlaw.com

Dated: July 8, 2011

Brian C. Sheehy

By His Attorney,

/s/Gary W. Cruickshank, Esq.  
21 Custom House Street  
Suite 920  
Boston, MA 02110  
(617) 330-1960  
[gwc@cruickshank-law.com](mailto:gwc@cruickshank-law.com)  
BBO #0107500